

1 Peter R. Afrasiabi (Bar No. 193336)  
2 pafraziabi@onellp.com  
3 **ONE LLP**  
4 23 Corporate Plaza, Suite 150-105  
5 Newport Beach, CA 92660  
6 Telephone: (949) 502-2870  
7 Facsimile: (949) 258-5081

8 *Attorneys for Plaintiffs,*  
9 Joanna Ardalan, Esq. and One LLP

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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **SOUTHERN DIVISION**

14 JOANNA ARDALAN, ESQ, an  
15 individual; ONE LLP, a California  
16 Limited Liability Partnership,

17 Plaintiff,

18 v.

19 DOE 1, d.b.a LAW INTEGRAL, LLC,  
20 business entity unknown; DOE 2, d.b.a  
21 DEPUTY TRADEMARK, business  
22 entity unknown; DOE 3, p.k.a  
23 MICHELLE SPRAGUE, an individual;  
24 DOE 4, d.b.a TRADEMARK  
25 INTEGRAL, business entity unknown;  
26 DOE 5, d.b.a  
27 BRANDREGISTRATION.ORG,  
28 business entity unknown; and DOES 6  
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)  
Hon. Kenly Kiya Kato

**[PROPOSED] ORDER RE EX  
PARTE APPLICATION  
REQUESTING EARLY  
DISCOVERY**

1 For good cause shown, Plaintiffs Joanna Ardalan and One LLP may conduct  
2 early discovery as follows:

3 They may issue subpoenas on NameCheap, Inc. GoDaddy.com, Inc., and their  
4 cloaking services, Withheld for Privacy Ehf, and Domains by Proxy, LLC,  
5 respectively, as well as ZenDesk, Inc., Venmo, Paypal, American Express, Visa,  
6 Mastercard, Discover, and the United States Patent and Trademark Office to  
7 discover the identity of Defendants and the extent to which they have profited from  
8 the websites identified in the complaint, including lawintegral.com,  
9 brandregistration.org, trademarkintegral.com, deputytrademark.com, as well as  
10 deputytrademarks.com.

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Hon. Kenly Kiya Kato  
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